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10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 IN THE MATTER OF THE
14 EXTRADITION OF

15 MICHAEL ALEJANDRO
16 CASTILLO MURGA,

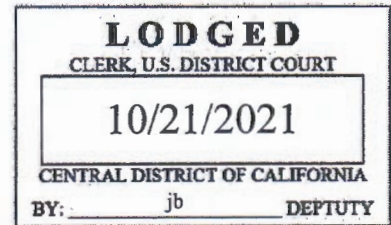
17 A Fugitive from the
Government of El Salvador.

No. 2:24-mj-06387-duty

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER ALLOWING FILING ITS
REQUEST FOR CERTIFICATION OF
EXTRADITION UNDER SEAL WITHOUT
COPIES OR SERVICE OF EXHIBITS
(FORMAL EXTRADITION DOCUMENTS);
DECLARATION OF JOHN J. LULEJIAN

[18 U.S.C. § 3184]

(UNDER SEAL)



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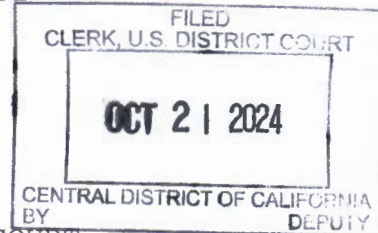
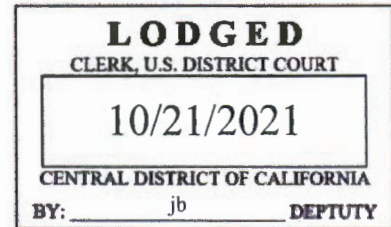
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[18 U.S.C. § 3184]

(UNDER SEAL)



21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorney John J. Lulejian,
24 hereby applies ex parte for an order directing that the Request for
25 Certification of Extradition and accompanying exhibits, which include
26 a copy of the formal extradition documents and diplomatic note from
27
28

1 the Government of Mexico,¹ be filed and maintained under seal,
2 without copies or service thereof, except that counsel for the
3 relator, MICHAEL ALEJANDRO CASTILLO MURGA ("CASTILLO MURGA"), as well
4 as counsel for the government, may have access to those documents.²

5 The United States will file openly (i.e., not under seal) and
6 separately a redacted copy of its Request for Certification of
7 Extradition and accompanying exhibits.

8 This ex parte application is made pursuant to Local Rule 79-5
9 and is based on the attached declaration of John J. Lulejian. As set
10 forth in the declaration, the exhibits attached to the Request for
11 Certification of Extradition include formal extradition papers that
12 contain personal identifying information about the relator, including
13 but not limited to, his date of birth and home address. In addition,
14 these exhibits include the identifying and personal information about
15 the victims, one of whom is a minor. To protect such information
16 from public disclosure, the government respectfully requests that the
17 Court order

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25 ¹ The United States will lodge the original version of the
26 extradition request bearing ribbons and seals under seal at a later
date.

27 ² Although the United States requests that it not be required to
28 serve copies of the under seal extradition request and accompanying
exhibits on CASTILLO MURGA's counsel, the United States will provide
counsel with unredacted copies of these documents.

1 the above-referenced documents to be filed under seal. See 18 U.S.C.
2 § 3771(a)(1), (8); Fed. R. Civ. P. 5.2; Fed. Crim. P. 49.1; Local
3 Civ. R. 5.2; Local Crim. R. 49.1.

4 Dated: October 21, 2024

Respectfully submitted,

5 E. MARTIN ESTRADA
6 United States Attorney

7 MACK E. JENKINS
8 Assistant United States Attorney
Chief, Criminal Division

9 /s/ John J. Lulejian

JOHN J. LULEJIAN

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DECLARATION OF JOHN J. LULEJIAN

I, John J. Lulejian, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys representing the government in this case.

2. The government requests leave to file under seal the Request for Certification of Extradition and accompanying exhibits, which include a copy of the original formal extradition documents and diplomatic note from the Government of El Salvador. These exhibits include formal extradition papers, some of which contain personal identifying information about the relator, including but not limited to, his date of birth and home address. In addition, these exhibits include the identifying and personal information about the victims, one of whom is a minor.

3. Should the Court deny this application, the government respectfully requests that the Request for Certification of Extradition and this application not be filed, but be returned to the government, without filing of the documents or reflection of the name or nature of the documents on the clerk's public docket.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 21st day of October, 2024, at Los Angeles, California.

/s/ John J. Lulejian
JOHN J. LULEJIAN